

The Office alleges that group I claims are "drawn to computing floating point operations to provide color space conversion, classified in class 345, subclass 643" and group II claims are "drawn to evaluating exponential functions using single instruction, multiple data instructions, classified in class 712, subclass 22." Applicants respectfully submit that the claims groups would be more appropriately classified together and involve a same field of search, such that there are not sufficient reasons for insisting upon restriction under MPEP § 808.02.

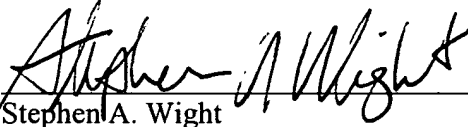
More particularly, both claim groups are directed to the field of conversion between two sensory data models or representations that are related by a power function. For example, claim 1 recites, "a method of efficiently converting sensory data between a perceptual data representation and a physical data representation, where the perceptual data representation is related to the physical data representation by an expression involving a power function..." On the other hand, claim 19 recites, "software program code... for effecting efficient conversion... between sensory data represented in a non-linear scale sensory data model and representation in a linear scale sensory data model, where the non-linear and linear scale sensory data models are related by a conversion function involving a computationally expensive exponential power function..." The claim groups therefore would be appropriately classified together, have not acquired separate status in the art, and would have a co-extensive search. Accordingly, Applicants submit that the Office has not established sufficient reasons for insisting upon restriction. The restriction therefore should be withdrawn.

Applicants provisionally elect Group I (claims 1-18) for prosecution in the present application, subject to the foregoing traverse.

Respectfully submitted,

KLARQUIST SPARKMAN, LLP

By


Stephen A. Wight
Registration No. 37,759

One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Telephone: (503) 226-7391
Facsimile: (503) 228-9446
cc: Client (155514.2)